

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

U.S. ANESTHESIA PARTNERS, INC., et al.,

Defendants.

Case No.: 4:23-CV-03560-KH

**DECLARATION OF ALEX P. TREIGER IN SUPPORT OF  
DEFENDANT U.S. ANESTHESIA PARTNERS, INC.'S  
MOTION FOR LEAVE TO AMEND ITS ANSWER**

I, Alex P. Treiger, under penalty of perjury pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an Associate with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. in Washington, D.C., and serve as counsel for Defendant U.S. Anesthesia Partners, Inc. (“USAP”) in the above-captioned matter. I submit this Declaration in support of USAP’s Motion For Leave To Amend Its Answer. I have personal knowledge of the facts set forth herein and am competent to testify thereto if called as a witness.

2. Attached as **Exhibit A** is a true and correct excerpt of the Federal Trade Commission’s First Set of Requests for Admission to Defendant U.S. Anesthesia Partners, Inc., dated March 7, 2025.

3. Attached as **Exhibit B** is a true and correct excerpt of USAP’s Objections and Responses to the Federal Trade Commission’s First Set of Requests for Admission, dated April 16, 2025.

4. Attached as **Exhibit C** is a true and correct copy of a letter from Michael J. Arin to Rebecca A. Beynon, dated April 30, 2025.

5. Attached as **Exhibit D** is a true and correct excerpt of USAP's Amended Objections and Responses to the Federal Trade Commission's First Set of Requests for Admission, dated May 28, 2025.

6. Attached as **Exhibit E** is a true and correct copy of a letter from Rebecca A. Beynon to Michael J. Arin, dated May 28, 2025.

7. Attached as **Exhibit F** is a true and correct copy of an email exchange among counsel from April 30, 2025 through June 3, 2025.

8. Attached as **Exhibit G** is a true and correct copy of USAP's proposed Amended Answer with redline changes against USAP's Answer, Dkt. No. 157.

9. Attached as **Exhibit H** is a true and correct excerpt of the FTC's Responses and Objections to USAP's First Set of Interrogatories.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on June 20, 2025, in Washington D.C.

/s/ Alex P. Treiger  
Alex P. Treiger